

Todd L. Bice, Esq., Bar No. 4534  
[TLB@pisanellibice.com](mailto:TLB@pisanellibice.com)  
Dustun H. Holmes, Esq., Bar No. 12776  
[DHH@pisanellibice.com](mailto:DHH@pisanellibice.com)  
Brittnie T. Watkins, Esq., Bar No. 13612  
[BTW@pisanellibice.com](mailto:BTW@pisanellibice.com)  
PISANELLI BICE PLLC  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101  
Telephone: 702.214.2100

*Attorneys for Plaintiff Aprintess Williams*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

APRINTESS WILLIAMS,

Mr. Williams,

v.

STATE OF NEVADA, DEPARTMENT  
OF PAROLE & PROBATION,  
MATTHEW KROOK, ERIC CHANDLER,  
DOES 1 THROUGH 10; AND ROE  
ENTITIES 1 THROUGH 10

Defendant(s).

Case No.: 2:16-CV-1283 JCM (VCF)

**MOTION TO EXTEND TIME TO  
RESPOND TO MOTION FOR  
SUMMARY JUDGMENT**

**(First Request)**

Plaintiff Aprintess Williams ("Mr. Williams"), by and through his undersigned counsel, respectfully requests, pursuant to Local Rule IA 6-1 and Federal Rule of Civil Procedure 6(b), an extension of time to respond to Defendants' State of Nevada, *et al.*, ("Defendants") Motion for Summary Judgment ("Motion") (ECF No. 63) from July 31, 2018, to August 14, 2018. This is the first request for an extension of time to respond to the Motion.

In addition to LR IA 6-1, FRCP 6(b) addresses extending time, stating in pertinent part, "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires." Fed. R. Civ. P. 6(b)(A)(1). "Good cause is a non-rigorous standard that has been construed broadly across procedural and statutory contexts." *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010). An application for extension of time under Rule 6(b) "should

1 normally be granted in the absence of bad faith on the part of the party seeking relief or prejudice  
2 to the adverse party." *Id.* (quotations and citations omitted).

3 This extension is sought in good faith and is not requested for any improper purpose or  
4 delay. Plaintiff's counsel, Brittnie T. Watkins, Esq., is currently out of the office on maternity  
5 leave and other attorneys in the law firm for Plaintiff are providing assistance on this matter while  
6 she is out. However, additional time is needed to fully respond to the Motion. Prior to filing this  
7 motion, Plaintiff's counsel attempted to contact Defendants' counsel regarding this request, but  
8 contact was unsuccessful as Defendants' counsel is out of the office with limited access to email  
9 until August 6, 2018. Because attempts to contact Defendants' counsel were unsuccessful,  
10 Plaintiff is unaware of Defendants' position on this request. However, the parties have previously  
11 entered into various extensions to extend deadlines with no objection, and there is no prejudice to  
12 Defendants in granting this request. Accordingly, Plaintiff respectfully requests this Court grant  
13 the request for extension of time to respond to Defendants' Motion (ECF No. 63) from July 31,  
14 2018, to August 14, 2018.

15 DATED this 30th day of July, 2018.

16 PISANELLI BICE PLLC

17 By: /s/Dustun H. Holmes

18 Todd L. Bice, Esq., Bar No. 4534  
19 Dustun H. Holmes, Esq., Bar No. 12776  
20 Brittnie T. Watkins, Esq., Bar No. 13612  
21 400 South 7<sup>th</sup> Street, Suite 300  
22 Las Vegas, Nevada 89101

23 *Attorneys for Plaintiff Aprintess Williams*

24 **IT IS SO ORDERED.**

25   
26 **UNITED STATES MAGISTRATE JUDGE**  
27 **DATED: 8-1-2018**  
28

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC, and that on this 30th day of July, 2018, I caused to be served through the Court's E-Filing/E-Service system true and correct copies of the above and foregoing to **MOTION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT** the following:

David Keene, Esq.  
Office of the Attorney General  
Grant Sawyer Bldg.  
555 E. Washington Ave. Suite 3900  
Las Vegas, NV 89101

/s/ Kimberly Peets  
An employee of PISANELLI BICE PLLC